

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

A123 SYSTEMS LLC,

Plaintiff,

v.

APPLE INC., MUJEEB IJAZ, DON DAFOE,
MICHAEL ERICKSON, DaPENG WANG and
INDRAJEET THORAT

Defendants.

Civil Action No. 15-cv-10438-DPW

STIPULATION OF DISMISSAL

Pursuant to Rule 41(a)(1)(A)(ii), Plaintiff A123 Systems LLC (“A123”) hereby dismisses the Complaint with prejudice and without costs, waiving all rights of appeal. Defendants hereby stipulate to the dismissal. The parties agree that the Court will retain jurisdiction over this matter with respect to any application made by a party to enforce the terms of the parties’ Confidential Settlement Agreement.

Respectfully submitted,

A123 SYSTEMS LLC

By its attorneys,

/s/ Michael L. Rosen

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Respectfully submitted,

**APPLE INC., MUJEEB IJAZ, DON
DAFOE, MICHAEL ERICKSON,
DAPENG WANG AND INDRAJEET
THORAT,**

By their attorneys,

/s/ Michael Mankes

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Dated: June 15, 2015

Certificate of Service

I, Michael L. Rosen, certify that on June 15, 2015 I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for Defendants.

/s/ Michael L. Rosen

Michael L. Rosen